Dockets Management Branch (HFA-305) Food and Drug Administration 5630 Fishers Lane Rm. 1061 Rockville, MD 20852

In response to your request for comments regarding Docket #98N-1038 "Irradiation in the production, processing and handling of food", I submit the following:

The irradiation disclosure statement should be made clearer. Notice of irradiated product ingredients must be included in order for the statement to be truthful and non-misleading. Because irradiation can change the taste, texture, storage characteristics and nutrients of a food, it is important to know whether any part of it has been subjected to this process.

Labeling of such products should be prominent and contain the actual words "irradiated" or "irradiation", rather than euphemisms such as "cold pasteurized". The absence of a statement would be misleading because irradiation destroys vitamins and causes changes in sensory and spoilage qualities. Disclosure statement requirements should not have an expiration date.

Respectfully,

Suzan Rowe

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